

ATTACHMENT 1

1. ANSWER TO QUESTION 10: Extel Services LLC (Applicant) intends to provide switched services over its authorized private lines only if the country at the foreign end of the private line appears on a Commission list of destinations to which the Commission has authorized the provision of switched services over private lines.

2. ANSWER TO QUESTION 11:

47 CFR 63.18(i): Applicant is a foreign carrier. Applicant has no affiliations with another foreign carrier.

47 CFR 63.18(j): Applicant intends to provide traffic between the US and Russia. Applicant is a foreign carrier in Russia.

47 CFR 63.18(k): Russia provides effective competitive opportunities to U.S. carriers to compete in its market for the service that the applicant intends to provide (facilities-based, resold switched, or resold non-interconnected private line services). U.S. carriers have the legal ability to enter the Russian market and provide facilities-based international services such as IMTS. U.S. carriers have the legal ability to enter the Russian market and provide resold international switched services (for switched resale applications) or non-interconnected private line services for private line resale applications. Reasonable and nondiscriminatory charges, terms and conditions for interconnection to a Russian carrier's domestic facilities for termination and origination of international services or the provision of relevant resale services exists. Competitive safeguards exist in Russia to protect against anticompetitive practices, including safeguards such as cost-allocation rules to prevent cross-subsidization; timely and nondiscriminatory disclosure of technical information needed to use, or interconnect with carriers' facilities; and protection of carrier and customer proprietary information. Russia has an effective regulatory framework to develop, implement and enforce legal requirements, interconnection arrangements, and other safeguards.

47 CFR 63.18(l): Applicant proposes to resell the international switched services of unaffiliated U.S. carriers for the purpose of providing international telecommunications services to Russia. Pursuant to Section 63.10(a)(3), Applicant lacks sufficient market power in Russia to affect competition adversely in the U.S. market. Applicant lacks 50 percent of the market share in the international transport and local access markets in Russia and should be presumptively classified as non-dominant.

47 CFR 63.18 (m): Applicant qualifies for non-dominant status pursuant to Section 63.10. Applicant certifies that its foreign affiliate lacks sufficient

market power in Russia to affect competition adversely in the U.S. market. The foreign affiliate lacks 50 percent market share in the international transport and the local access markets in Russia.

3. ANSWER TO QUESTION 15: Applicant has not previously received authority under Section 214 of the Communications Act.
4. ANSWER TO QUESTION 15: Applicant is not applying for facilities or provide services not covered by 47 CFR 63.18(e)(1) and (e)(2).
5. ANSWER TO QUESTION 15: Applicant is not categorically excluded as defined by Section 1.1306 of the Commission's rules, from seeking facilities-based authorization under 47 CFR 63.18.